

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI**

**MISSOURI PRIMATE FOUNDATION, ET
AL,**

Plaintiffs and Counterclaim
Defendants,

-against-

**PEOPLE FOR THE ETHICAL
TREATMENT OF ANIMALS, INC., ET AL,**

Defendants and Counterclaim
Plaintiffs.

Case No. 4:16-cv-02163

Judge: Honorable Catherine D. Perry

**COUNTERCLAIM DEFENDANT TONIA HADDIX'S MOTION FOR
TERMINATING SANCTIONS**

Counterclaim Defendant Tonia Haddix respectfully moves this Court to enter terminating sanctions against Plaintiffs People for the Ethical Treatment of Animals and Angela Scott (collectively, PETA). Such sanctions are necessary because PETA, in its Fourth Motion to Show Cause (the Motion), ECF No. 333, and the Supplement thereto (the Supplement), ECF No. 337, attempted to obtain relief by deceiving this Court through material misrepresentations, including both materially false statements and material omissions. For the reasons set forth more fully in the memorandum filed herewith, PETA's two separate attempts to commit fraud on this Court are sufficient to warrant terminating sanctions.

Date: August 20, 2021
Los Angeles, California

Respectfully submitted,

/s/ John M. Pierce

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CERTIFICATE OF SERVICE

I hereby certify that, on August 20, 2021, the foregoing COUNTERCLAIM
DEFENDANT TONIA HADDIX'S MOTION FOR TERMINATING SANCTIONS
was filed via the Court's electronic filing system, which constitutes service upon all
counsel of record.

/s/ John M. Pierce

John M. Pierce